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9 FUJIFILM CORPORATION

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION
13

14 LARGAN PRECISION CO., LTD.,
15 Plaintiff and Counterclaim Defendant,
16 v.
17 FUJIFILM CORPORATION,
18 Defendant and Counterclaim Plaintiff.
19

Case No. CV-10-1318 SBA

**STIPULATION REGARDING DISMISSAL
OF AND EVIDENCE RELATING TO A
CLAIM FOR MONEY DAMAGES OR
INJUNCTIVE RELIEF AND SECONDARY
CONSIDERATIONS OF NON-
OBVIOUSNESS AND DISCOVERY
RELATED TO SAME**

20 The Honorable Sandra Brown Armstrong
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1 In order to streamline the litigation of this case, simplify the issues for trial, and save the
2 parties' time and expense, Fujifilm Corporation ("Fujifilm") and Largan Precision Co., Ltd.
3 ("Largan") stipulate and agree:

- 4 1. Fujifilm and Largan stipulate and agree to the dismissal with prejudice of any and all of
5 Fujifilm's claims for damages against Largan for the alleged infringement of U.S. Patent
6 No. 7,453,654 ("the '654 patent"); Fujifilm further stipulates and agrees that it will not
7 present any evidence on, make any argument about, or otherwise address the issue of
8 damages in the above-captioned case, from the date of this stipulation on, including but
9 not limited to trial;
- 10 2. Fujifilm and Largan stipulate and agree to the dismissal with prejudice of Fujifilm's claim
11 for an injunction based on the alleged infringement of the '654 patent; Fujifilm further
12 stipulates and agrees that it will not present any evidence, make any argument, or
13 otherwise address the issue of injunctive relief on the '654 patent in the above-captioned
14 case, from the date of this stipulation on, including but not limited to trial; and
- 15 3. Fujifilm further stipulates and agrees that it will not present any evidence on, make any
16 argument about, or otherwise address any of the secondary considerations of non-
17 obviousness with respect to the '654 patent in the above-captioned case, from the date of
18 this stipulation on, including but not limited to trial.

19 Largan, in turn, stipulates and agrees that it will not take fact or expert discovery in this
20 action on the aforesaid matters.

21 This stipulation and agreement is made without prejudice to, shall not affect, and shall not
22 be admissible with respect to any other claims, defenses, or evidence presented by Fujifilm or
23 Largan in this action or any other action. The entry of this stipulation by either party shall not, by
24 itself, give rise to any claim for costs or fees by either party hereto.

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26 IT IS SO AGREED AND STIPULATED.
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1 Dated: March 5, 2013

MORGAN, LEWIS & BOCKIUS LLP

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3 By /s/ Rita E. Tautkus

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10 Plaintiff FUJIFILM CORPORATION

11 Dated: March 5, 2013

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FILER'S ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3) regarding signatures, I, Rita E. Tautkus, attest that concurrence in the filing of this document has been obtained from each of the other signatories. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 5th day of March, 2013, at San Francisco.

/s/ Rita E. Tautkus
Rita E. Tautkus